REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

Disposition of Claims

Claims 1-4 and 6-27 were pending in the present application. By way of this reply, claims 2 and 18 have been cancelled without prejudice or disclaimer. Accordingly, claims 1, 3, 4, 6-17, and 19-27 are pending in the present application. Claims 1 and 17 are independent. The remaining claims depend, either directly or indirectly, from claims 1 and 17.

Claim Amendments

Claims 1, 6, 12, 17, and 21 have been amended for clarification. No new matter has been added by way of these amendments as support for these amendments may be found, for example, on page 9, lines 18-25 of the Instant Specification.

Supplemental IDS

A supplemental IDS is included with this submission. Applicant respectfully requests the Examiner consider and acknowledge the disclosed reference.

Rejections under 35 U.S.C. §103

Claims 1-4 and 6-27 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,999, 811 issued to Molne (hereinafter "Molne") in view of U.S. Patent No. 5,675,628 issued to Hokkanen (hereinafter "Hokkanen"). By way of this reply, claims 2 and 18 have been cancelled without prejudice or disclaimer. Thus, the rejection is moot as to

those claims. As for the remaining claims, for the reasons set forth below, this rejection is respectfully traversed.

Molne discloses a preferred roaming list that identifies and prioritizes networks to which a mobile telephone can connect. This list is maintained at a predetermined memory location in the subscriber identity module (SIM) of the mobile telephone, and the mobile telephone connects with the highest ranked network on the list. As is well known in the art, SIMs have an EF_PLMN file which contains a list of networks to which the mobile telephone can connect. The EF_PLMN is therefore the type of list referred to by Molne. (*See* Molne at column 3, lines 1-6 and lines 31-32). In other words, Molne is focused on a SIM switching networks. Molne describes a roaming mechanism in which there is only one subscriber identity for all networks listed in the EF_PLMN file. (*See* Molne at column 3, lines 21-45). However, Molne is completely silent regarding multiple subscriber identities and does not teach or suggest the SIM switching subscriber identities depending on the network to which the mobile telephone is connected.

Hokkanen discloses a system and method of using predetermined bits of a Temporary Mobile Subscriber Identity (TMSI) to determine the telecommunications network from which a new user originated, and then requesting the actual mobile subscriber identity of the user from the telecommunications network of origin. (*See* Hokkanen at Abstract and column 6, lines 1-59).

Amended independent claim 1 of the present invention recites, in part, "switching the subscriber identification module to the second identity on the second telecommunication network when the mobile telephone station leaves the coverage field of the first telecommunication network" and "automatically switching the subscriber identification

module to the first identity on the first telecommunication network whenever the mobile telephone station is in the coverage field of the first telecommunication network, irrespective of the coverage of said mobile telephone station by said second telecommunication network." Amended independent claim 17 has similar limitations. As discussed above, Molne is completely silent regarding multiple subscriber identities and therefore cannot disclose switching between subscriber identities depending on the telecommunications network to which the mobile telephone is connected as recited in the amended claims. Thus, Molne also cannot disclose automatically switching to the first network *under the first subscriber identity* when a mobile telephone is using the second telecommunications network and the first telecommunications network becomes available (*i.e.*, the networks overlap) as recited in the claims. Hokkanen is completely silent regarding the scenario when the networks overlap, and thus, like Molne, cannot possibly disclose automatically switching to the first network under the first subscriber identity as recited in the claims.

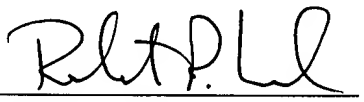
Molne and Hokkanen, whether viewed separately or in combination, fail to disclose all the limitations of amended independent claims 1 and 17. Thus, amended independent claims 1 and 17 are patentable over Molne and Hokkanen. Claims 3, 4, 6-16, and 19-27 depend, either directly or indirectly, from claims 1 and 17 and are allowable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 09669/006001).

Dated: September 6, 2005

Respectfully submitted,

By 

Robert P. Lord
Registration No.: 46,479
OSHA · LIANG LLP
1221 McKinney St., Suite 2800
Houston, Texas 77010
(713) 228-8600
(713) 228-8778 (Fax)
Attorney for Applicant